

REMARKS

In the Office Action mailed June 30, 2008, the Examiner noted that claims 1-3, 6-9, 12-15, 18, 19, 22, and 23 were pending, that claim 23 has been withdrawn from consideration, and rejected claims 1-3, 6-9, 12-15, 18, 19 and 22 under 35 USC 103(a) as being unpatentable over Valentino (US Patent No. 4,648,037) in view of Kramer (US Patent No. 6,327,574).

The claims are amended and cancelled without disclaimer or prejudice. The rejections are traversed. No new matter has been added.

The Office Action maintains the rejections from the previous Office Action. In the Response to Arguments, page 16, lines 5-7, the sentence starting with 'while ...,' the Examiner implies the language of claims does not expressly demarcate among the various apparatuses controlling various information.

In addition, the Office Action relies upon Valentino column 14, line 45 to column 15, lines 23 for allegedly discussing the claimed "purchase simulator." However, Valentino only discusses presenting what-if scenarios to the user, which differs from the present invention simulating for an advertiser a purchase of a product advertised by the advertiser based upon user information and providing a product promotion analysis based upon the purchase simulation to the advertiser of the product, providing a benefit of substantially reducing disclosure of user information to the advertiser so that the advertiser can perform promotion analysis. For example, paragraphs 36, 37 and 53 support the claims.

To clarify the language of independent claims, taking into consideration the Examiner comments, independent claim 1 is amended to require:

1. (currently amended) An information inquiry apparatus that receives an information inquiry of a user from a terminal connected through a communication pathway and that receives advertising information of a product, including pricing data and/or an advertisement link that allows access to additional advertising information, from an advertising company, the information inquiry apparatus comprising:

an electronic data storage device that stores

an inquiry information file that stores the inquiry information for each member of an organization; of the user, and

an advertisement information file that stores the advertising information, possibly including an advertisement link that allows access to an additional advertising information, said advertising information being sent from an advertising company;

and

a computer processor that executes

retrieval of user information according to the
information inquiry of the user,

an inquiry image display generator that generates
and transmits display data from the inquiry information file and the
advertisement information file so that a display image of the
display data contains the inquiryretrieved user information for the
member of the organization and the advertising information,
possibly including the advertisement link that allows access to the
additional advertising information;

an inquiry information transmitter that receives the
information inquiry from the terminal and transmits the inquiry
image;

a purchase simulator that simulates the
member'sfor the advertising company a purchase of the
advertising company product based upon the retrieved user
information and the received advertising information including the
pricing data, the advertising company's product using a simulation
database containing products and product prices of the advertising
company; and

a product promotion analyzer that computes a
product promotion result of advertisement on the basis of an
output of the advertising information based upon the purchase
simulatorsimulation and sendstransmits the product promotion
result of more than one memberusers in aggregate to the
advertising company such that privacy is further ensured for the
more than one memberusers.

It is readily apparent that Valentino and Kramer do not expressly disclose the language of amended claim 1, because Valentino only discusses presenting what-if scenarios to the user, which differs from the present invention simulating for an advertiser a purchase of a product advertised by the advertiser based upon user information and providing a product promotion analysis based upon the purchase simulation to the advertiser of the product. In addition, Kramer column 13, lines 33-53, as acknowledged by the Office Action Response to Arguments, page 16, item 5.b, may be discussing promotion analysis on the server side, however, Kramer is silent on simulation of a purchase on behalf of the advertising company, namely "***a purchase simulator that simulates the member'sfor the advertising company a purchase of the advertising company product based upon the retrieved user information and the received advertising information*** including the pricing data."

In addition, a prima facie case of obviousness based upon Valentino and Kramer cannot

be maintained, because there is no evidence that one of ordinary skill in the art at the time of the invention would have combined Valentino with Kramer and then further modified Valentino's conventional what-if scenarios with Kramer's promotion analysis to provide present invention according to the language of amended claim 1, namely "a purchase simulator that **simulates the member's for the advertising company a purchase of the advertising company product based upon the retrieved user information and the received advertising information** ... and a product promotion analyzer that **computes a product promotion result of advertisement on the basis of an output of the advertising information based upon the purchase simulator simulation and send transmits the product promotion result of more than one member users in aggregate to the advertising company ...**". Withdrawal of the rejection of claim 1 and allowance of claim 1 is requested.

INDEPENDENT CLAIMS 7 and 13

Independent claim 7 is amended to require "**simulating the employee's on behalf of the organization and the advertising company a purchase of the advertising company product** using a simulation database containing products and product prices of the advertising company based upon the employee detailed wage information of the organization and the advertising information including the pricing data." In contrast to Valentino and Kramer, the language of claim 7 requires an organization simulating a purchase for the advertising company, based upon the employee detailed wage information of the organization and the advertising information of the advertiser and "**computing a product promotion result of the advertising information based upon advertisement on the basis of an output of the simulating of the purchase by the organization** and sending transmitting the product promotion result of more than one employee employees in aggregate to the first source advertising company ...". Withdrawal of the rejection of claim 7 and allowance of claim 7 is requested.

Independent claim 13 is amended to require limitations similar to the discussed limitations of amended claim 7.

DEPENDENT CLAIM 6

Allowance of dependent claim 6 is requested. In addition, amended dependent claim 6 is allowable, which requires "wherein the user is an employee of an organization and the advertising information includes information tailored to at least one of an employee income level, an employee organizational unit and an employee information input" in combination with "a

purchase simulator that simulates the member's for the advertising company a purchase of the advertising company product based upon the retrieved user information and the received advertising information including the pricing data. A benefit of the invention is allowing an organization to permit an advertising company to advertise a product to an employee of the organization and for the organization, via a purchase simulation performed by the organization, provide promotional analysis of the advertiser's product to the advertiser based upon employee information without disclosing confidential employee information to the advertiser.

The remaining dependent claims inherit the patentable recitations of their respective base claims, and therefore, patentably distinguish over the cited art for the reasons discussed above in addition to the additional features recited therein.

In accordance with the foregoing, it is respectfully submitted that all outstanding objections and rejections have been overcome and/or rendered moot. Further, all pending claims patentably distinguish over the prior art. There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance, which is requested.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If any further fees are required in connection with the filing of this Amendment, please charge our Deposit Account No. 19-3935.

Respectfully submitted,
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